

RUSSELL D. GREER
CHAPTER 13 STANDING TRUSTEE
P.O. BOX 3051
MODESTO, CALIFORNIA 95353-3051
TELEPHONE (209) 576-1954

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

| | | | |
|---------------|---|------------------------------------|---------------|
| In re: |) | Case No.: | 15-21371 |
| |) | D.C. No.: | RDG-2 |
| RADHEY SHYAM |) | | |
| |) | CHAPTER 13 | |
| LILLIAM SHYAM |) | | |
| |) | MOTION FOR ORDER OF DISMISSAL | |
| |) | PURSUANT TO 11 U.S.C. SECTION 1307 | |
| |) | | |
| Debtor(s). |) | DATE: | July 28, 2015 |
| |) | TIME: | 10:30 AM |
| |) | DEPT.: | D |

TO THE DEBTOR(S) AND HIS/HER ATTORNEY:

YOU AND EACH OF YOU are hereby notified that at 10:30 AM on July 28, 2015, in Courtroom 34, Sixth Floor, of the U.S. Bankruptcy Court, 501 I Street, Sacramento, California, Russell D. Greer, Chapter 13 Standing Trustee, will move for an Order of Dismissal of the above-referenced case pursuant to Section 1307 of the Bankruptcy Code for the following reason(s):

- X 1. Unreasonable delay by the debtor(s) that is prejudicial to creditors. [§1307(c)(1)]
- 2. Payments to the Trustee are not current under the debtor(s) proposed plan. [§1307(c)(4)]
- 3. Payments to the Trustee are not current under the debtor(s) confirmed plan. [§1307(c)(6)]
- X 4. Cause: Failure to confirm a plan. An objection to confirmation of Debtors' plan was heard on June 9, 2015, and the Court sustained the objection and denied confirmation of the plan.

WHEREFORE, the Trustee requests that the Court enter an Order of Dismissal of this Chapter 13 case.

Dated: July 6, 2015

/s/ RUSSELL D. GREER
RUSSELL D. GREER,
CHAPTER 13 STANDING TRUSTEE